

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC. AND
LIZ VELAZQUEZ MCKINNON,

Defendants.

_____ /

**DEFENDANTS' MOTION FOR EXTENTION OF TIME
TO FILE THEIR OBJECTIONS TO REPORT AND RECOMMNDATIONS**

Defendants, ALL VIP CARE INC. and LIZ VELAZQUEZ MCKINNON by and through undersigned counsel, and pursuant to Fed. R. Civ. P. Rule 6 and Local Rule 7.1(a), hereby requests a brief extension of time to file their objections to the Report and Recommendation entered on August 15, 2024, and in support thereof provides the following good cause:

1. On August 15, 2024, the Honorable Magistrate Patrick Hunt entered his Report and Recommendations on the Plaintiff's Bill of Costs and Motion For an Award of Attorney's Fees and Costs [ECF No. 175]
2. The deadline to serve and file written objections to the findings in the Report and Recommendation are due today.

3. Undersigned counsel is unable to complete or file a response today due to her firm's Office 365 accounts were hacked and compromised, and has been working to resolve this technological nightmare which has completely disrupted the Firm's operations. **See attached as Composite Exhibit "A"** a copy of Microsoft 365 Tech Support Response and sample hack email that was sent from undersigned's Firm emails to numerous people requesting that they click on link, among other tech issues that it has affected in the firm.

4. Undersigned has been advised by the IT Support Department of Go Daddy (who hosts the Firm's domain),and Microsoft that this could take anywhere from 24 to 72 hours for the systems to be back to normal.

5. Undersigned had to go to another computer away from the office to be able to prepare this motion.

6. Defendants request a short, 4-day enlargement of time, through and including September 3, 2024, to serve its objections the Report and Recommendations.

7. Counsel certifies that this motion is brought in good faith and not for any improper or dilatory purpose

WHEREFORE, Defendants ALL VIP CARE, INC. and LIZ VELASQUEZ MCKINNON, respectfully requests this Court grant Defendants' Motion For Extension of Time to serve

its objections to the Report and Recommendation, by September 3, 2024, and such other and further relief as this Court deems just and proper.

LOCAL RULE 7.3 CONFERRAL STATEMENT

I hereby certify that, Pursuant to Local Rule 7.3 a good faith effort to resolve issues by agreement are occurring. Undersigned counsel attempted to reach counsel for Plaintiff, Mr. Brian Pollock via phone and text message, but was unable to reach him in time to file this motion. As such the parties were unable to resolve the issues as they relate to this motion.

Respectfully Submitted,

/s/Elizabeth P. Perez

Elizabeth P. Perez, Esq.

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Florida Bar No.:182461

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a copy of this pleading which was filed with the Clerk of the Court was provided to Brian Pollock, Esq., Counsel for Plaintiff, at 135 San Lorenzo Ave., Ste. 770, Coral Gables, FL 33146, brian@fairlawgroup.com via the Court's ECM/ECF Portal on August 29, 2024.

/s/ Elizabeth P. Perez

Elizabeth P. Perez, Esq.

Elizabeth

From: Advanced Technical Support <gao-support@services.secureserver.net>
Sent: Thursday, August 29, 2024 3:23 PM
To: epperez@icloud.com
Subject: Microsoft 365 Support Request - ATS-358519

We've received your request and our team will start work on it as soon as possible.

Your Issue Key is:

ATS-358519

You can expect a response from us within 72 hours. Please be aware that Microsoft escalations can take 7 to 10 days.

If we need any more information, we'll email you to ensure we get it and can move forward. If you haven't heard from us in the timeframes listed above, please [contact us](#).

Thank you,
Advanced Technical Services

[Reply via portal here](#)

By using these products, you agree that you are bound by the Terms of Service.

This email is shared with Elizabeth Perez.

COMPOSITE EXHIBIT A



Elizabeth Perez

To ● Elizabeth Perez

Bcc ○ info@forsterboughman.com; ○ reception-pines@hamptonoffices.com; ○ office365alerts@microsoft.com; ○ info@motorcycleaccidentsummit.com; ○ 20support@lawclerk.legal; ○ info.na@speech.com; ○ amejias@lawgmp.com; ○ rahmansteve@nahaw.com; ○ maggie.forster@cityofdoral.com; ○ ncanela@playatkins.com; ○ david.moadab@solutionssquad.com; ○ support@inreachce.com; ○ accounting@floridabar.org; ○ acasals@rjdiegolaw.com; ○ sam79@godaddy.com; ○ mr@gopressjo.co; ○ jarie@bankofedison.com; ○ assistant@sotelolaw.com; **+147 others**



Thu 8/29/2024 1:09 PM

Attachments

+ Get more add-ins



Adobe Acrobat Sign



Elizabeth P. Perez, Esq. requests your signature on
[TV Großwallstadt GmbH Company AUG 09.22.2024](#)

Review and sign

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

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